

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF MICHIGAN

DWAYNE B., by his next friend, John Stempfle;
CARMELA B., by her next friend, William Ladd;
LISA J., by her next friend, Teresa Kibby; and
JULIA, SIMON, and COURTNEY G., by their
next friend, William Ladd; for themselves and
others similarly situated,

Plaintiffs,

v.

CASE: 2:06-cv-13548
Hon. Nancy G. Edmunds

JENNIFER GRANHOLM, in her official
capacity as Governor of the State of
Michigan, MARIANNE UDOW, in her
official capacity as Director of the Michigan
Department of Human Services (“DHS”);
LAURA CHAMPAGNE, in her official
capacity as Chief Deputy Director of DHS
Operations; and JAMES HENNESSEY, in
his official capacity as Deputy Director of
DHS Children’s Services,

Defendants.

Marcia Robinson Lowry (Bar No. 1187053)
Sara M. Bartosz (Bar No. 6194058)
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Attorney for Defendants

STIPULATION AND ORDER TO PRODUCE NAMED PLAINTIFF RECORDS

By agreement of the parties and for good cause shown, it is hereby ORDERED that:

1. To facilitate the parties' ongoing settlement negotiations, Plaintiffs' Next Friends have requested, on behalf of the Named Plaintiffs, through duly executed Authorizations to Release DHS Foster Care Records that Defendants produce the complete foster care case files in the custody or control of the supervising agency or agencies for each of the Named Plaintiffs as compiled from the date of each child's initial entry into the legal custody of the state of Michigan through the present date to Children's Rights and Dykema Gossett, PLLC. Defendants do not object to this request. The above files shall be made available to Children's Rights and Dykema Gossett, PLLC in their current form on a rolling basis, but no later than ten (10) calendar days from the date of entry of this order.

2. Plaintiffs' counsel, Children's Rights and Dykema Gossett, PLLC, shall maintain the above case files in accordance with the terms of the parties' Stipulated Confidentiality Order signed and entered by the Court contemporaneously with this stipulation.

s/Nancy G. Edmunds
Nancy G. Edmunds
United States District Judge

Dated: September 12, 2006

I hereby certify that a copy of the foregoing document was served upon counsel of record on September 12, 2006, by electronic and/or ordinary mail.

s/Carol A. Hemeyer
Case Manager

AGREED TO AND APPROVED FOR ENTRY:

ATTORNEYS FOR PLAINTIFFS:

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Sara M. Bartosz
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ATTORNEY FOR DEFENDANTS

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